UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION

No. 2:18-md-02323-AB

INJURY LITIGATION

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden, On behalf of themselves and Others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties LLC, successor-in-interest to NFL Properties, Inc.,

Defendants.

THIS DOCUMENT REALTES TO: 2:12-md-02323-AB

DECLARATION OF WILLIAM G. CALDES PURSUANT TO THE COURT'S ORDER DATED MARCH 28, 2018

William G. Caldes declares as follows pursuant to 28 U.S.C. § 1746:

- I am a Partner of the law firm of Spector Roseman & Kodroff. Pursuant to this Court's Order dated March 28, 2018, I submit this declaration.
- 2. I have personal knowledge of the matters set forth in this declaration and, if called upon, I could and would testify competently thereto.
- 3. Spector Roseman & Kodroff ("SRK") currently represents Settlement Class Member Floyd Wedderburn.

- 4. I declare that SRK is seeking payment from the Attorneys' Fees Qualified Settlement Fund and hereby answers the following questions presented by the Court:
 - SRK currently represents Settlement Class Member Floyd Wedderburn.
 SRK previously also represented settlement class members Sirr Parker and Jerrell Pippens.
 - 2. Plaintiff Floyd Wedderburn is a member of Settlement Subclass 1 certified by the Court. He has not applied for a Monetary Award.
 - 3. Plaintiff Sirr Parker voluntarily dismissed his case on July 7, 2012.
 - 4. Plaintiff Jerrell Pippens terminated his engagement with SRK on June 5, 2017.
 - 5. SRK has not represented any plaintiff who has entered any agreements to assign their rights to a Monetary Award ("Assignments").
 - 6. Plaintiff Floyd Wedderburn has not entered any agreement to assign his rights to a Monetary Award.
 - 7. SRK is not obligated to pay or forward any portion of a Monetary Award received by Floyd Wedderburn to any Third-Party Litigation Funder.
 - 8. SRK has not played any role in creating, promoting or facilitating
 Assignments or obligations as referenced in this Court's March 28, 2018 Order.
 - 9. No SRK attorney or attorney associated with SRK has a direct or indirect association with any Third-Party Litigation Funder used by Settlement Class Members.
 - 10. SRK has no Assignments for Third Party Litigation Funders.

5. SRK does not have any documents to submit responsive to this Court's March 28, 2018 Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 7, 2018, at Philadelphia, PA.

/s/ William G. Caldes
William G. Caldes

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on all counsel of record by the Court's ECF System.

Dated: May 7, 2018

/s/ William G. Caldes

William G. Caldes

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